

RAYMOND AND RAYMOND

ATTORNEYS AT LAW

**7 GLENWOOD AVENUE, 4th FLOOR, STE. 408
EAST ORANGE, NEW JERSEY 07017**

TELEPHONE: (973) 675-5622

TELEFAX: (408) 519-6711

EMAIL: herbertraymond@gmail.com

June 8, 2020

Honorable Stacey Meisel, U.S.B.J.
U.S. Bankruptcy Court
50 Walnut Street, 3rd Floor
Newark, NJ 07102

Re: Dina Cela
19-31263
Chapter 13

Proceeding: Specialized Loan Servicing's Application for
Early Termination of Loss Mitigation
Hearing Date: To Be Determined

Dear Judge Meisel:

Please accept this letter in opposition to Specialized Loan Servicing's ("SLS") Application for Early Termination of Loss Mitigation.

SLS' application is based on the fact that debtor's loan modification application was previously denied. This is partially true. However, the file is back now under review again and in underwriting.

The file had been denied due to a lack of income under FHA guidelines. However, this review of income did not take into account the contributor's income that had been provided in the application as well. Per FHA guidelines, in order for contributor income to be reviewed, my understanding is that now contributors must agree to assume the mortgage if the modification is approved. Accordingly, debtor's father provided a letter to SLS indicating that he is willing to assume the mortgage if the modification is approved. Based on such, the loan is now once again back in underwriting with the father's income now being considered.

Accordingly, SLS' application to terminate loss mitigation

should be denied.

Respectfully Submitted,

/s/ HERBERT B. RAYMOND, ESQ.

Herbert B. Raymond, Esq.